

**Hearing Date: August 9, 2021 at 10:00 a.m. (ET)**  
**Objection Deadline: July 19, 2021 at 4:00 p.m. (ET)**

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the People of the State of California*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>In re:</b>	)	Chapter 11
	)	
<b>PURDUE PHARMA, L.P., et al.,</b>	)	Case No. 19-23649 (RDD)
	)	
<b>Debtors.</b>	)	(Jointly Administered)
	)	
	)	

**JOINDER OF THE STATE OF CALIFORNIA AND THE PEOPLE OF THE STATE OF  
CALIFORNIA TO OBJECTION OF THE STATE OF WASHINGTON AND THE  
STATE OF OREGON, AND THE OBJECTING STATES TO  
CONFIRMATION OF THE DEBTORS' PLAN OF REORGANIZATION**

To the Honorable Robert D. Drain, United States Bankruptcy Judge:

The State of California and the People of the State of California (collectively,  
“California”), by and through the California Attorney General, object to confirmation of the  
*Sixth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its  
Affiliated Debtors* (“Plan”) [Dkt. 3185] and join in the *Objection of the State of Washington, the*

*State of Oregon, and the Objecting States to Confirmation of the Debtors' Plan of Reorganization* dated July 19, 2021. California agrees that the Plan is unconfirmable because it purports to unlawfully impose broad third-party, nonconsensual releases of claims and causes of action against the Sackler Family Members and others, including the nonconsensual release of sovereign police-power actions asserted by various States, including California, on behalf of their citizens. *See* 11 U.S.C. § 524(e) (“[D]ischarge of a debt of the debtor does not affect the liability of any other entity on, or the property of any other entity for, such debt.”); *see also, e.g., Deocampo v. Potts*, 836 F.3d 1134, 1143 (9th Cir. 2016) (collecting cases); *In re Johns-Manville Corp.*, 517 F.3d 52, 66 (2d Cir. 2008), *vacated & remanded on other grounds*, 557 U.S. 137 (2009), *aff’g in part & rev’g in part*, 600 F.3d 135 (2d Cir. 2010); *Bank of New York Tr. Co. v. Off. Unsecured Creditors’ Comm. (In re Pac. Lumber Co.)*, 584 F.3d 229, 252 (5th Cir. 2009); *Landsing Diversified Props.-II v. First Nat’l Bank & Tr. Co. of Tulsa (In re W. Real Estate Fund, Inc.)*, 922 F.2d 592, 601–02 (10th Cir. 1990); *FTC v. First All. Mortg. Co. (In re First All. Mortg. Co.)*, 264 B.R. 634 (C.D. Cal. 2001).

**WHEREFORE**, California respectfully requests that this Court deny confirmation of the Plan.

Dated: July 19, 2021  
Los Angeles, CA

Respectfully submitted,

/s/ Bernard A. Eskandari  
BERNARD A. ESKANDARI  
Supervising Deputy Attorney General

**CERTIFICATE OF SERVICE**

I, Bernard A. Eskandari, hereby certify that, on July 19, 2021, I caused true and correct copies of the foregoing document to be served by (i) the Court's Case Management/Electronic Case File (CM/ECF) System to all parties who are deemed to have consented to electronic service; (ii) email upon the parties who provided email addresses set forth in the Master Service List maintained by the Debtors in respect of these chapter 11 cases; and (iii) email upon the chambers of the Honorable Judge Robert D. Drain (rdd.Chambers@nysb.uscourts.gov) and the Office of the United States Trustee for the Southern District of New York (Attn: Paul K. Schwartzberg, paul.schwartzberg@usdoj.gov).

*/s/ Bernard A. Eskandari*

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BERNARD A. ESKANDARI